



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 14, 2022

By Email and USAfx

Paul A. Goldberger
Renee Melinda Wong
c/o Goldberger & Dubin PC
401 Broadway, Suite 306
New York, New York 10013

Re: United States v. Congying Zheng
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Media reports related to Operation Fox Hunt	CZ-004209	CZ-004231
Select records from previously produced search warrant returns	CZ-004232	CZ-004387
Facebook records and data	CZ-004388	CZ-004396
Facebook records and data	CZ-004973	CZ-004973
Facebook records and data	CZ-004974	CZ-004974
Capital One records	CZ-004397	CZ-004575, CZ-004983
TD Bank records	CZ-004576	CZ-004972

Description	Begin Bates	End Bates
AT&T records	CZ-004975	CZ-004975
AT&T records	CZ-004976	CZ-004976
Locus records	CZ-004977	CZ-004977
Verizon records	CZ-004978	CZ-004978
Google records	CZ-004979	CZ-004979
Google records	CZ-004980	CZ-004980
Forensic report of mobile device	CZ-004981	CZ-004981
Data from extraction of mobile device	CZ-004982	CZ-004982

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers the materials marked produced today that have been marked “SENSITIVE” to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)